

DMB:KAY
F. #2008B01056
INCLER'S OFFICE
U.S. DISTRICT COURT E.D.N.Y.

★ DEC 23 2010 ★
UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

BROOKLYN OFFICE - - - - -X

CR 10 1020
VITALIANO, J.

UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

(T. 18, U.S.C., §§
1001(a)(2) and 3551 et
seq.

ABDEL HAMEED SHEHADEH,
also known as "Abul-Qasim,"
"Abul-Qasim Ibn Abu Muhammad,"
"Sunnah101" and "Abu Baheera,"

GOLD, N.J.

Defendant.

- - - - -X

THE GRAND JURY CHARGES:

COUNT ONE
(Material False Statement)

1. On or about June 13, 2008, within the Eastern District of New York, the defendant ABDEL HAMEED SHEHADEH, also known as "Abul-Qasim," "Abul-Qasim Ibn Abu Muhammad," "Sunnah101" and "Abu Baheera," did knowingly and willfully make a materially false, fictitious and fraudulent statement and representation, in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit: the Federal Bureau of Investigation ("FBI"), where the offense involved international and domestic terrorism, in that the defendant falsely stated to an FBI agent that he was traveling to Pakistan to attend a religious school, when in fact, as he then and there well knew and believed, the defendant was not traveling to Pakistan to

attend a religious school, but rather to join a jihadist fighting group.

(Title 18, United States Code, Sections 1001(a)(2) and 3551 et seq.)

COUNT TWO
(Material False Statements)

2. On or about and between July 16, 2008 and February 10, 2009, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant ABDEL HAMEED SHEHADEH, also known as "Abul-Qasim," "Abul-Qasim Ibn Abu Muhammad," "Sunnah101" and "Abu Baheera," did knowingly and willfully make one or more materially false, fictitious and fraudulent statements and representations, in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit: the FBI, where the offense involved international and domestic terrorism, in that the defendant made the following false statements:

(a) SHEHADEH falsely stated to an FBI agent that the purpose of his travel to Pakistan was to attend a religious school and an engagement party, when in fact, as he then and there well knew and believed, the purpose of the defendant's travel to Pakistan was not to attend a religious school and an engagement party, but rather to join a jihadist fighting group; and

(b) SHEHADEH falsely denied to an FBI agent that the purpose of his travel to Pakistan was to join a jihadist fighting group, when in fact, as he then and there well knew and believed, the purpose of the defendant's travel to Pakistan was to join a jihadist fighting group.

(Title 18, United States Code, Sections 1001(a)(2) and 3551 et seq.)

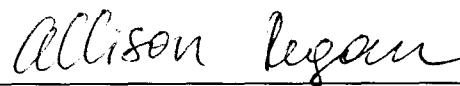
COUNT THREE
(Material False Statement)

3. On or about February 10, 2009, within the Eastern District of New York, the defendant ABDEL HAMEED SHEHADEH, also known as "Abul-Qasim," "Abul-Qasim Ibn Abu Muhammad," "Sunnah101" and "Abu Baheera," did knowingly and willfully make a materially false, fictitious and fraudulent statement and representation, in a matter within the jurisdiction of the executive branch of the Government of the United States, to wit: the FBI, where the offense involved international and domestic terrorism, in that the defendant falsely stated to an FBI agent that he had never told anyone that he intended to travel to Pakistan to join a jihadist fighting group, when in fact, as he then and there well

knew and believed, the defendant had previously told one or more persons that the purpose of his travel to Pakistan was to join a jihadist fighting group.

(Title 18, United States Code, Sections 1001(a)(2) and 3551 et seq.)

A TRUE BILL



FOREPERSON



LORETTA E. LYNCH
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

No.

UNITED STATES DISTRICT COURT

EASTERN District of NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

ABDEL HAMEED SHEHADEH, also known as
“Abul-Qasim,” “Abul-Qasim Ibn Abu Muhammad,”
“Sunnah101” and “Abu Baheera,”

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 1001(a)(2) and 3551 et seq.)

A true bill.

Allison Roper

Foreman

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

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